

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NASIR LEWIS

Defendant.

Case:2:22-cr-20595
Judge: Goldsmith, Mark A.
MJ: Stafford, Elizabeth A.
Filed: 11-10-2022 At 03:20 PM
INDI USA V. LEWIS (NA)

Violations:
18 U.S.C. § 1343
18 U.S.C. § 1028A

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. § 1343 – Wire Fraud)

Beginning in or around March 2020 and continuing through in or around August 2020, in the Eastern District of Michigan and elsewhere, the defendant, NASIR LEWIS, with the intent to defraud, knowingly devised and executed a scheme to defraud in order to deprive another of money and property by means of materially false and fraudulent representations.

The purpose of the scheme to defraud was for NASIR LEWIS to unlawfully obtain state and federal unemployment insurance (UI) benefit money.

It was part of the scheme that NASIR LEWIS submitted false and fraudulent UI benefit claim applications to multiple states—including California, Louisiana, and Michigan—in the names of various individuals, without their consent, knowledge, or permission.

It was part of the scheme that NASIR LEWIS used these other individuals' names, social security numbers, and other personal identifiable information (PII), without their consent, knowledge, or permission, in the course of the UI benefit claim submission process.

It was further part of the scheme and artifice that, for the UI benefit claims submitted to California, NASIR LEWIS would cause a bank to mail, via U.S. Postal Service, debit cards to an address in his control. These debit cards ("UI debit cards") were then loaded, electronically, with state and federal UI benefits by the various state treasury departments.

It was further a part of the scheme and artifice that once NASIR LEWIS obtained these UI debit cards, he would use the funds contained thereon in the Eastern District of Michigan and elsewhere.

During the time period set forth above, in the Eastern District of Michigan, for the purpose of executing the above-described scheme to defraud, NASIR LEWIS knowingly transmitted and caused the transmission by means of wire, radio, or television communication, writings, signals, pictures, and sounds in

interstate commerce, in the form of: on July 8, 2020, an interstate electronic submission of a fraudulent UI claim was filed from within the Eastern District of Michigan to the California Employment Development Department (“EDD”), in violation of Title 18, United States Code, Section 1343.

COUNT TWO

(18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft)

The allegations contained in Count One are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

On or about July 8, 2020, in the Eastern District of Michigan and elsewhere, the defendant NASIR LEWIS, knowingly possessed and used, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028(A)(c)—that is, Wire Fraud, in violation of 18 U.S.C. § 1343, as alleged in Count One—knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

THIS IS A TRUE BILL

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/Craig Wininger
CRAIG WININGER
Chief, Violent and Organized Crime Unit

s/David Cowen
DAVID COWEN
Assistant U.S. Attorney

s/Jeanine Brunson
JEANINE BRUNSON
Assistant U.S. Attorney

Dated: November 10, 2022

United States District Court Eastern District of Michigan	Criminal Case Cov
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>DPX</i>

Case Title: USA v. Nasir Lewis

County where offense occurred : Wayne

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- no prior complaint.
☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 22-MJ-30473]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

November 10, 2022
 Date

(Signature)
 David Cowen
 Assistant United States Attorney
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.